

1 Q. And that would be adult probationers?

2 A. Right.

3 Q. And what color clothing did they wear?

4 A. They would wear vests, like safety  
5 vests. There wasn't any specific color that they  
6 would have to wear as far as clothes go. They can  
7 wear anything they like as long as it was  
8 appropriate, but they would wear like safety vests,  
9 either usually red or blue.

10 Q. Now, how would you know where to take  
11 these workers?

12 A. Well, what happened is the day would  
13 start out where we would go to the ODOT garage and  
14 they would give us a specific location that they  
15 want done that day.

16 Q. And when you use the word location,  
17 were these locations Ohio -- on Ohio property?

18 A. Yes, the highways.

19 Q. So as far as you know, you weren't --  
20 ODOT was not giving you instructions to clean up on  
21 city property?

22 A. Exactly. We do not do city --

23 Q. Go ahead finish.

24 A. As far as I know, we didn't do any city  
25 properties, it's always been highway.